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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS MOTION
IN LIMINE TO EXCLUDE TESTIMONY OF
MR. BROWN AND MR. GUDJONSSON
REGARDING PROTECTIONS OF
WAYMO'S ALLEGED TRADE SECRETS**

Courtroom: 8 (19th Floor)
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:
1. Declaration of Neel Chatterjee
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Trial: October 10, 2017

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal portions of its Motion in Limine to Exclude Testimony of Mr. Brown and Mr. Gudjonsson Regarding Protections of Waymo’s Alleged Trade Secrets (the “Brown and Gudjonsson Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Brown and Gudjonsson Motion	Highlighted Portions
Exhibit 1 to Vu Declaration	Entire Document
Exhibit 2 to Vu Declaration	Entire Document
Exhibit 3 to Vu Declaration	Entire Document
Exhibit 4 to Vu Declaration	Entire Document
Exhibit 5 to Vu Declaration	Entire Document
Exhibit 6 to Vu Declaration	Entire Document
Exhibit 7 to Vu Declaration	Entire Document
Exhibit 8 to Vu Declaration	Entire Document
Exhibit 9 to Vu Declaration	Highlighted Portions
Exhibit 10 to Vu Declaration	Highlighted Portions
Exhibit 12 to Vu Declaration	Entire Document
Exhibit 13 to Vu Declaration	Highlighted Portions
Exhibit 14 to Vu Declaration	Highlighted Portions
Exhibit 15 to Vu Declaration	Entire Document
Exhibit 16 to Vu Declaration	Entire Document
Exhibit 17 to Vu Declaration	Entire Document
Exhibit 18 to Vu Declaration	Entire Document

Exhibit 19 to Vu Declaration	Entire Document
Exhibit 20 to Vu Declaration	Entire Document
Exhibit 23 to Vu Declaration	Entire Document

The highlighted portions of the Brown and Gudjonsson Motion, the highlighted portions of Exhibits 9, 10, 13, and 14 to the Vu Declaration, and the entirety of Exhibits 1, 2, 3, 4, 6, 7, 8, 12, 15, 16, 17, 18, 19, 20 and 23 to the Vu Declaration contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Brown and Gudjonsson Motion that merit sealing.

Dated: September 16, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 16, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 16, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE